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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

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In Re:	)	Case No.: 20-21652
	)	
Jennifer D Turner	)	Chapter 13
	)	
Debtor(s).	)	Judge Jack B. Schmetterer

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**NOTICE OF MOTION & SHORTEN NOTICE**

TO: See attached service list via U.S. Mail and Electronic Service Notice to applicable parties

PLEASE TAKE NOTICE that on August 18, 2021, at 10:00 am, I will appear before the Honorable Jack B. Schmetterer or any judge sitting in that judge's place and present the attached Motion to Use Sell or Lease Property 363(b) on shortened notice at which time you may appear if so desired, a copy of which is hereby filed with this notice.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting

ID and password. - Meeting ID: 161 123 7008 - Passcode: 277139

To appear by telephone, call Zoom for Government at 669-254-5252 or 646-828-7666. Then enter the meeting ID and password above.

The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: David H Cutler  
Attorney for Debtor  
4131 Main St. Skokie, IL 60076  
[cutlerfilings@gmail.com](mailto:cutlerfilings@gmail.com)

CERTIFICATE OF SERVICE I, David H Cutler, certify/declare under penalty of perjury under the laws of the United States of America that I served a copy of this notice and the attached motion/application on each entity shown on the attached list at the address shown and by the method indicated on the list on August 5, 2021, before 10:00 p.m.

/s/ David H. Cutler  
David H. Cutler, esq.

Attorney for Debtor(s)  
Cutler & Associates Ltd.  
4131 Main St.  
Skokie IL 60076  
(847) 673-8600

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MOTION TO USE SELL OR LEASE PROPERTY 363(b) FOR THE PURPOSES OF A  
SHORT SALE

NOW COMES the Debtor, Jennifer D Turner, (hereinafter referred to as “DEBTOR”), by and through her attorneys, Cutler and Associates, Ltd., and move this Honorable Court for entry of an Order to Use Sell or Lease Property 363(b) for the purposes of a Short Sale and in support thereof, respectfully represents as follows:

1. On December 17, 2020, the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtors Chapter 13 plan was confirmed by this Honorable court on April 7, 2021.
3. The Debtor would like to proceed to accept an offer to short-sale the real property located at 5339 Lincoln Ave Skokie, IL 60077. (See attached Exhibit A)
4. The real estate property is encumbered by a mortgage with Land Home Financial Services Inc., for approximately \$278,632.12.
5. That Land Home Financial Services Inc. has given approval of the short sale. (See attached Exhibit B)
6. The Debtor has a benefit to short sale this property so there is no deficiency that the Debtor needs to pay through the Plan.
7. That the automatic stay has not been lifted from the property.

8. Therefore, the Debtor requests that this Honorable Court allow her to enter into this short-sale agreement.

WHEREFORE, Debtor respectfully prays that this Court enter an order granting her authority to enter in the short-sale agreement for the property located at, 5339 Lincoln Ave Skokie, IL 60077, and for such other and further relief this court deems just and equitable.

/s/ David H. Cutler  
David H. Cutler, ESQ  
Attorney for Debtor(s)  
Cutler & Associates Ltd.  
4131 Main Street  
Skokie IL 60076  
(847) 673-8600